

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

GREAT LAGOON, LLC,

Plaintiffs,

-against-

RANDY DODD, WELLS FARGO BANK
NATIONAL ASSOCIATION, NOT IN ITS
INDIVIDUAL CAPACITY, BUT SOLELY AS
TRUSTEE FOR SRMOF II 2011-1 TRUST,

Defendant.

Case No. 2:18-cv-6548-SJF-GRB

**WELLS FARGO BANK NATIONAL
ASSOCIATION'S NOTICE OF
MOTION TO DISMISS THE
COMPLAINT**

Please take notice, that, upon the annexed declaration of Kathleen R. Fitzpatrick, dated December 21, 2018, and the exhibits thereto, and the accompanying memorandum of law, dated December 21, 2018, defendant Wells Fargo Bank National Association, not in its Individual Capacity, but solely as Trustee For SRMOF II 2011-1 Trust will move this Court, before the honorable Sandra J. Feuerstein, in the United States Courthouse, located at 100 Federal Plaza, Central Islip, New York 11722, for an order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing the complaint in its entirety and such other and further relief as this Court deems just and proper.

Dated: December 21, 2018

AKERMAN LLP

By: s/ Kathleen R. Fitzpatrick

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Wells Fargo Bank National
Association, not in its Individual
Capacity, but solely as Trustee for
SRMOF II 2011-1 Trust*